

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	CRIMINAL NO. 1:20-CR-5
	§	JUDGE THAD HEARTFIELD
TINA GILDER	§	

MOTION FOR COUNSEL TO WITHDRAW

**TO THE HONORABLE UNITED STATES DISTRICT JUDGE FOR THE
EASTERN DISTRICT OF TEXAS, BEAUMONT DIVISION:**

COMES NOW, RUSSELL J. WRIGHT, CJA Appointed Attorney for TINA GILDER, Defendant and files this motion for counsel to withdraw as CJA court appointed counsel for the Defendant and would show as follows:

I.

This case is currently set for Jury Selection and trial on May 17, 2021.

II.

GROUND FOR WITHDRAWAL

Defense Counsel had open heart surgery on April 12, 2021, and sustained medical complications following surgery. Defense Counsel is uncertain of when he will be able to return to the practice of law. Due to Defense Counsel's current condition he is unable to meet scheduling orders deadlines or provide professional legal representation for his client.

III.

The Counsel requests that this Honorable Court allow him to withdraw as CJA appointed attorney of record for the Defendant. This motion is not made for purposes of delay but in order that justice may be done.

WHEREFORE, PREMISES CONSIDERED, Counsel for Defendant would request that he be allowed to withdraw as Attorney of record and that a substitute counsel be appointed.

Respectfully submitted,
/s/ RUSSELL J. WRIGHT
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CERTIFICATE OF CONFERENCE

Counsel for the Defendant has conference with Michael Andrew Anderson, Assistant United States Attorney, and he advised me that he will not oppose this motion.

/s/ RUSSELL J. WRIGHT
RUSSELL J. WRIGHT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been delivered by electronic filing to Michael Andrew Anderson, Assistant United States Attorney and all other attorneys who receive electronic filings for this case on this 29th day of April, 2021.

/s/ RUSSELL J. WRIGHT
RUSSELL J. WRIGHT